

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

GSNRH, LLC,

Plaintiff,

v.

SENTINEL INSURANCE COMPANY, LTD.,

Defendant.

CIVIL ACTION NO. 16-11556

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §1446, Sentinel Insurance Company, Ltd. hereby files and submits this Notice of Removal. In support of this Notice of Removal, Sentinel Insurance Company, Ltd. states as follows:

1. Plaintiff, GSNRH, LLC (“Plaintiff”), is a Massachusetts limited liability company with a principal place of business located at 33 Deer Path, Hudson, Massachusetts, 01749.
2. Defendant, Sentinel Insurance Company, Ltd. (“Sentinel”) is a Connecticut corporation with a principal place of business located at One Hartford Plaza, Hartford, Connecticut, 06155.
3. Sentinel was served with a copy of the Plaintiff’s Complaint on June 28, 2016.
4. Removal is timely under 28 U.S.C. §1446(b), as fewer than thirty (30) days have passed since Sentinel was served with process.
5. Pursuant to 28 U.S.C. §1446(a), Sentinel attaches a copy of the Complaint as Exhibit A.
6. Removal is based on diversity of citizenship between all parties and an amount in controversy that exceeds \$75,000.

7. The Plaintiff contends that Sentinel has committed a breach of contract and violated M.G.L. c. 93A and 176D by refusing to provide insurance coverage for the Plaintiff's claimed water damage to a vacant commercial property located at 250 Worcester Road, Framingham, Massachusetts ("Property") under a Business Owner's Policy, No. 08SBAPY2938 ("Policy") (Exhibit A, ¶¶ 6-22). Further, the Plaintiff claims that Sentinel should be barred from denying coverage under the terms of the Policy based on the doctrine of promissory estoppel. (Exhibit A, ¶ 23).

8. Based on the Plaintiff's statement of damages on the civil action coversheet filed in the Massachusetts Superior Court (\$140,000.00), as well as the fact that the Plaintiff seeks treble damages, interest, attorneys fees and costs under M.G.L. c 93A, Sentinel asserts that the amount in controversy exceeds \$75,000.

9. Accordingly, this Court has jurisdiction over this civil action based upon diversity of citizenship and an amount in controversy pursuant to 28 U.S.C. §§1332, 1441 and 1446.

10. In submitting this Notice of Removal, Sentinel reserves all defenses to this action.

WHEREFORE, Defendant Sentinel Insurance Company, Ltd. hereby requests that the above action now pending the Massachusetts Superior Court be removed to the United States District Court for the District of Massachusetts.

Respectfully submitted,

**SENTINEL INSURANCE COMPANY,
LTD**

By: Their Attorneys

/s/ Matthew R. Watson

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Dated: July 28, 2016

CERTIFICATE OF SERVICE

I, Matthew R. Watson, hereby certify that the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Matthew R. Watson

Matthew R. Watson